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March 12, 2020

Via ECF & Fax Hon. Nelson S. Román U.S. District Judge U.S. District Court Southern District of New York 300 Quarropas Street White Plains, NY 10601 Fax: (914) 390-4179

Nelson S. Román, U.S.D.J.

The application is

White Plains, New York 10601

Clerk of the Court reguested to terminate the motion (doc.

Re:

BMG Monroe I, LLC v. Vill. of Monroe Docket No. 20 Civ. 1357 (NSR)(JCM)

Your Honor:

We represent defendant the Village of Monroe. With Plaintiff's consent, we write respectfully to request a 60-day extension—from March 16, 2020 to May 15, 2020—of Defendant's deadline to answer, move, or otherwise respond to the Complaint. This is Defendant's first request to extend this deadline.

The 51-page Complaint, which includes 368 pages of exhibits, concerns a land-use project that underwent an extensive review process dating back to 2001. Plaintiff also challenges the validity of several current and proposed Village laws under the Fair Housing Act. This extension of time will give us the opportunity to communicate with our clients, obtain the relevant documents, and respond to the myriad factual and legal issues this case presents in accordance with our obligations under Fed. R. Civ. P. 11. The extension will also allow the parties to discuss the possibility of resolving this matter without the need for motion practice or other responsive pleadings.

Thank you for consideration of this matter.

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DATE FILED: 3 | 13 | 2020

cc: All parties by ECF

Respectfully submitted, SOKOLOFF STERN LLP

Alexander J. Eleftherakis



FAX COVER SHEET

FAX NUMBER:

(914) 390-4179

PLEASE DELIVER TO:

Hon. Nelson S. Román

U.S. District Judge

Southern District of New York

FROM:

Alexander J. Eleftherakis

RE:

BMG Monroe I, LLC v. Village of Monroe

Docket No. 20-cv-1357 (NSR)(JCM)

File No. 200044

DATE:

March 12, 2020

TOTAL NUMBER OF PAGES:

2 (including this cover sheet)

Message:

Please see attached correspondence.

If this transmission is unclear or incomplete, please call (516) 334-4500.

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